

**Commonwealth of Kentucky**  
**Division for Air Quality**  
**PERMIT STATEMENT OF BASIS**

DRAFT PERMIT No. F-06-048  
REDLINE RACING AND RESTORATION, INC.  
1031 BROWN STREET, PADUCAH, KENTUCKY  
FROUGH SHERWANI, REVIEWER  
SEPTEMBER 6, 2006  
SOURCE ID: 021-145-00087  
SOURCE AI: 40296  
ACTIVITY NUMBER: APE20060001

**SOURCE PROCESS DESCRIPTION:**

Redline Racing and Restoration, Inc. in Paducah, Kentucky, manufactures fiberglass kiosks for the Dip-N- Dots Company as well as various types of fiberglass automotive bodies.

On April 27, 2006, the source applied to the Division for the renewal of their conditional major permit F-01-017. In addition, the source notified the Division regarding the removal of the "Car Restoration Operation" from their facility in 2003.

<b>Emission Point</b>	<b>01</b>	<b>Fiber Glass Operation</b>
	<b>MP1</b>	<b>Gelcoat Application</b>
	<b>MP2</b>	<b>Resin Application</b>
	<b>MP3</b>	<b>Catalyst</b>

**MP1:**

This point is for gelcoat operation. The air-assisted HVLPF spray gun rated 0.75 gallon/minute is used for this operation. There is no control of any pollutant at this point. This operation runs 175 hr per year. The "PTE" is based on 0.9 gallon/hr. The estimated transfer efficiency of the system is 70%.

**MP2**

This point is for Resin operation. The magnum chopper system ATC-4000 air-assisted airless spray gun rated 4.6 gallons/minute is used for this operation. There is no control of any pollutant at this point. This operation runs 87.5 hr per year. The "PTE" is based on 2.76 gallons /hr. The estimated transfer efficiency of the system is 70%.

**MP3**

This point is for catalyst. The consumption of catalyst is 1.6 gallons / hr. The "PTE" is based on 8760 hrs per year.

<b>Emission Point</b>	<b>02</b>	<b>Abrasive Media Blast</b>
-----------------------	-----------	-----------------------------

This point is for the media blasting. The consumption of the plastic media is 300 lbs/hr. The "PTE" is based on 8760 hrs per year. There is a fabric filter to control particulate matter. The estimated control efficiency of the filter is 90%.

**Emission Point                      03        Orange Tooling**

This point is for orange tooling. The consumption of the material is 0.0043 gallon/hr. There is no control of any pollutant at this point.

**Emission Point                      04        Mold Release Wax**

This point is for mold release. The consumption of the material is 1.0 gallon/year. There is no control of any pollutant at this point.

**Emission Point                      05        Gel Coat Sanding**

This point is for gel coat sanding. The consumption of the material is 1.0 gallon/year. There is no control of any pollutant at this point.

**Emission Point                      06        Filler and Putty**

This point is for filler and putty. The consumption of the material is 1.0 gallon/year. There is no control of any pollutant at this point.

**COMMENTS:**

**Type of control and efficiency:**

Emission point 02 has fabric filters to control particulate matter. The control efficiency of the filter is 90 %.

**Emission factors and their source:**

AP -42 5<sup>th</sup> edition, mass balance, and "Composite Factors Associates (CFA) unified Emissions Factors for open molding for composite" are used for the emission factors for PM, VOC and HAPS.

**Applicable regulation:**

- a.     **401 KAR 52:030.** Federally-enforceable permits for non major sources.
- b.     **401 KAR 59:010,** New Process Operations (applicable to each affected facility associated with a process operation commenced on or after July 2, 1975)

### **EMISSION AND OPERATING CAPS DESCRIPTION:**

1. The source has accepted a facility-wide cap on annual VOC emissions of no more than 90 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
2. The source has accepted a facility-wide cap on annual individual HAP emission of no more than 9.0 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
3. The source has accepted a facility-wide cap on annual combined HAPS emissions of no more than 22.5 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
4. The permittee shall not cause, suffer, allow, or permit any continuous emission into the open air from a control device or stack associated with any affected facility (s) which is equal to or greater than twenty (20) percent opacity.
5. For emission from a control device or stack, no person shall cause, suffer, allow or permit the emission in to the open air of particulate matter (PM) from any affected facility which in excess of 2.34 lb/hr.

### **CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.